

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BLACK LIVES MATTER SEATTLE-  
KING COUNTY, ABIE EKENEZAR,  
SHARON SAKAMOTO, MURACO  
KYASHNA-TOCHA, ALEXANDER  
WOLDEAB, NATHALIE GRAHAM,  
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF JESSICA BONAFILIA  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CONTEMPT

I, Jessica Bonafilia, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a resident of Seattle, Washington. I have been involved with the protests against police violence and systemic racism in Seattle since May 30, 2020.

3. I have attended approximately 25 protests in Seattle since May 30, 2020. I was exposed to tear gas at protests on several nights in early June, as well as pepper spray from blast balls.

1           4.       I attended the protest march on Saturday, July 25, 2020, that started near  
2 Broadway and Pine Street at Seattle Central Community College. I joined the march around 1:30  
3 p.m.

4           5.       We marched down to the youth jail and then back toward Cal Anderson Park on  
5 Capitol Hill. Once we got to the East Precinct at 12<sup>th</sup> Avenue and Pine Street, the police started  
6 throwing flash bangs at us.

7           6.       The police forced the portion of the protestors that I was with westward on Pine  
8 Street, past Rancho Bravo. No instructions or warnings were given before the grenades started  
9 going off. There were no dispersal orders.

10          7.       **I saw police officers throwing blast balls overhand into the crowd**  
11 **indiscriminately.**

12          8.       I was standing about ten rows back in the crowd of protestors, approximately ten  
13 feet from the front line. The entire crowd was trying to move back away from the police and the  
14 explosions, and I was also retreating. I was terrified of the number of blast balls and explosions  
15 going off, which were more than I had seen at any other protest this summer.

16          9.       **Suddenly, a blast ball came from overhead and landed on my leg right as it**  
17 **exploded. The force was strong enough that it knocked me to the ground and ripped holes**  
18 **in my jeans, shirt, and jacket.** This was at approximately 4:40 p.m.

19          10.       Attached as **Exhibit A** is a true and correct copy of a photograph I took on July  
20 25, 2020, of my leg and pants after I was hit with the blast ball.

21          11.       I was momentarily stunned and had to scramble to get off the ground and figure  
22 out what had just happened. I went to Cal Anderson Park and saw what looked like a bloody hole  
23 in my leg. I rinsed it with water. It burned, but I had too much adrenaline to really feel the pain at  
24 that time.

13. About two and a half hours later I was able to find a bathroom to remove my pants and look at the wound more closely. **I saw that both my thighs were covered with blood and burns. You can see the explosion pattern of the blast ball in the bruises and burns.**

14. Attached as **Exhibits B and C** are true and correct copies of additional photographs I took on July 25, 2020, of my legs after they were hit with the blast ball.

15. That night I was in severe pain in my legs due to the blast ball explosion. When I woke up the following morning, my legs had very tight pain, and occasional very sharp pains. Given the pain and the burns, I called my health insurance company's nurse-line, and the nurse recommended that I go to the ER, which I did.

16.      **The doctor told me that I have first and second degree burns on my leg.** The doctor also said it was difficult to tell what was a burn and what was an injury from the impact of the hit. **The doctors and nurses said they had never seen anything like my injury. They had to teach me how to clean and dress the wounds.**

17. I attended the protest on July 25, 2020, with seven other people. Though we were not at the front of the protest and were all about ten rows back, four of the eight of us were hit with projectiles in some fashion.

Executed this 27th day of July 2020 at Seattle, Washington.

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

By:

JESSICA BONIFILIA

# EXHIBIT A



# EXHIBIT B





# EXHIBIT C



